A. SITE LOCATION AND DESCRIPTION

The Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (the Site) is located in Kalamazoo and Allegan Counties, Michigan. The Site includes the Kalamazoo River and its adjacent floodplains and wetlands, from Morrow Lake Dam in Comstock Township, Kalamazoo County, downstream to Lake Michigan, as well as the lower three miles of Portage Creek, from Cork Street to the confluence with the Kalamazoo River. Five paper residual disposal areas and six paper mill properties located along the Kalamazoo River and Portage Creek are also included as part of the Site. Based on data collected by the potentially responsible parties (PRPs), it is estimated that there are at least 350,000 pounds of polychlorinated biphenyls (PCBs) in the sediment and soils in and adjacent to Portage Creek and the Kalamazoo River. The Site has been divided into several Operable Units (OUs), one of which is the 12th Street Landfill (12th St.-OU4), the subject of this Record of Decision (ROD).

The 12th St.-OU4 is located in the middle of Section 24, Township 1N, Range 12W, approximately 1.5-miles northwest of the city of Plainwell in Allegan County, Michigan, and 0.5-miles northeast of the Highway M-89 and 12th Street intersection (Figure 1). The 12th Street Landfill (landfill) is approximately 6.5 acres, and is bordered to the east by the former powerhouse discharge channel of the Plainwell Dam on the Kalamazoo River, to the north and northwest by wetlands, to the southeast by woodlands, and to the west by a gravel mining operation.

The areas that comprise the 12th St.-OU4 and that will be addressed by this ROD are shown on Figure 2 and listed below:

- The landfill itself, which primarily contains PCB-contaminated paper residuals (residuals), and from which PCB contamination has migrated into the surrounding areas.
- Groundwater contamination and any PCB-contaminated landfill leachate.
- The woodland located immediately south/southeast of the landfill.
- Wetlands, as identified by National Wetland Inventory maps, that border the landfill to the north and northwest.

- A portion of the adjacent gravel operation property (adjacent property) that borders the landfill to the west.
- A portion of the former powerhouse discharge channel of the Plainwell Dam on the Kalamazoo River, which contains residuals that have eroded from the east side of the landfill.

The 12th St.-OU4 is one of the major source areas of the Site. The landfill contains PCB-contaminated residuals, which have migrated into surrounding soils and river sediments. The landfill is a current, and potentially continuing, source of PCBs to the Kalamazoo River, its associated floodplains and wetlands, and to Lake Michigan. The remedial investigation (RI) for the 12th St.-OU4, together with other investigative documents prepared for the Site, have established that PCBs migrate from the 12th St.-OU4 into adjacent properties and, ultimately, off-site due to erosion. This migration of PCBs contributes to the ongoing contamination of the soils, sediments, surface water, and biota of the Site and Lake Michigan.

The Kalamazoo River and Portage Creek have been designated a site of environmental contamination under Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), due to PCB contamination. The Kalamazoo River and Portage Creek have been identified as an Area of Concern by the International Joint Commission on the Great Lakes due to the detrimental impact the release of PCBs has on Lake Michigan. Because of widespread PCB contamination, the Site was placed on the National Priorities List (NPL) in August 1990 in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act, 1980 PL 96-510 (CERCLA). In addition, due to the PCB contamination, the Michigan Department of Community Health has issued a fish consumption advisory annually since 1977 for reaches of the Kalamazoo River and Portage Creek, including the reach of the Kalamazoo River adjacent to the 12th St.-OU4.

The landfill, woodland, wetlands, adjacent property, and the former powerhouse discharge channel of the Kalamazoo River provide habitat for numerous important fish, aquatic, and terrestrial species. Species of special concern at the Site, including the 12th St.-OU4, include mink and eagles, due to their sensitivity to PCB contamination.

The river reach next to the 12th St.-OU4 is an important natural resource for southwest Michigan, providing recreational opportunities such as fishing, hunting, trapping, bird watching, boating, and swimming. The public enjoys recreational opportunities such as hiking and biking along extensive trail systems. Residents and visitors to the area also enjoy wetland and woodland habitats that support numerous species of plants, birds, reptiles, amphibians, and mammals.